

1 IN THE UNITED STATES DISTRICT COURT
2

3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 JASON GOODMAN

Case No.: 1:21-cv-10878-AT-JLC

5 Plaintiff,

6 vs.

PLAINTIFF'S RICO CASE STATEMENT

7 CHRISTOPHER ELLIS BOUZY, BOT
8 SENTINEL, INC, GEORGE WEBB
9 SWEIGERT, DAVID GEORGE SWEIGERT,
10 BENJAMIN WITTES, NINA JANKOWICZ,
11 ADAM SHARP, MARGARET ESQUENET,
12 THE ACADEMY OF TELEVISION ARTS
AND SCIENCES, SETH BERLIN,
MAXWELL MISHKIN

13 Defendants

14 Pro Se plaintiff Jason Goodman ("Goodman") files this RICO case statement.
15

16 **1. State whether the alleged unlawful conduct is in violation of 18 U.S.C. §§
17 1962(a), (b), (c), and/or (d).**

18 Plaintiff asserts violations of 18 U.S. Code § 1962(b)(c) and (d).

19 **2. List each defendant and state the alleged misconduct and basis of liability of
20 each defendant.**

- 21 1) Defendant - Christopher Ellis Bouzy ("Bouzy") is a New Jersey citizen and
22 CEO of Bot Sentinel, Inc., which claims to be an artificial intelligence
23 technology company that identifies and eliminates so called "disinformation"
24 as determined by Bouzy. Bouzy became a culpable person when he
25 voluntarily joined the association in fact Enterprise and began communicating
26 with existing participants. Bouzy received information from the Enterprise
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28

1 and used it in furtherance of the common purpose to damage Goodman and
2 his business property.

3 2) Defendant – David George Sweigert ("Sweigert") is believed to be a homeless
4 California citizen, a retired Air Force radio communications and Information
5 Technology Specialist, a professional hacker, the author of the Ethical
6 Hacker's Field Operations Guide and self-proclaimed contractor to the U.S.
7 Dept of Homeland Security and other Government Agencies. Sweigert is a
8 culpable person who has stalked and harassed Goodman since 2017.

9 Plaintiff alleges as follows with regard to Sweigert;

10 12 a. Sweigert has practiced law without a license in the U.S. District
11 Court for the Southern District of New York in violation of New
12 York Consolidated Laws, Education Law - EDN § 6512 by writing
13 and filing pro se pleadings on behalf of his brother George Webb
14 Sweigert ("Webb").

15 b. Sweigert conspired with multiple third parties and in violation of
16 violation of 18 U.S.C. § 35 to cause a false report of a bomb to incite
17 panic and provoke a public incident in the Port of Charleston, SC in
18 June of 2017.

19 c. Sweigert participated in a scheme to cause a fraudulent email to be
20 sent to the National Academy of Television Arts and Sciences
21 ("NATAS") in or around July 2020 creating a pretext for malicious
22 litigation calculated to financially damage Goodman by wrongfully

suing a corporation owned by Goodman to benefit Sweigert and his coconspirators in violation of 18 U.S.C. § 1343.

- d. Sweigert inappropriately interfered with litigation and harassed litigants in NATAS v MSD with the intent of affecting the outcome in violation of 18 U.S. Code § 1512 and causing substantial financial damage to Goodman beginning in 2020.
 - e. Sweigert participated in a scheme to cause a fraudulent document to be filed via the Pro Se Electronic Filing web site hosted by the Court in the Eastern District of Michigan (“MIED”) in violation of 18 U.S. Code § 1343.
 - f. Sweigert participated in a scheme to obstruct justice in this Court with frivolous filings and other acts intended to harass litigants and delay proceedings in violation of 18 U.S. Code § 1503.

3) Defendant - George Webb Sweigert ("Webb") is a Georgia citizen and a journalist. Webb is a culpable person who has conspired with his brother Sweigert for the common purpose of damaging Goodman and his business property.

Plaintiff alleges as follows with regard to Webb;

- a. Webb conspired with multiple third parties and in violation of violation of 18 U.S.C. § 35 and 18 U.S.C. § 1343 to cause a false report of a bomb to incite panic and provoke a public incident in the Port of Charleston, SC in June of 2017.

- 1 b. Webb participated in a scheme to cause a fraudulent document to be
2 filed via the Pro Se Filing web site hosted by the Court in the Eastern
3 District of Michigan ("MIED") in violation of 18 U.S. Code § 1343.
4 c. Webb participated in a scheme to obstruct justice in this Court with
5 frivolous filings and other acts intended to harass litigants and delay
6 proceedings in violation of 18 U.S. Code § 1503.
7 d. Webb defamed Goodman alleging false, unfounded claims of
8 heinous criminal acts alleged perpetrated by Goodman with the
9 deliberate intent of inciting public hatred against Goodman
10 4) Defendant - Christopher Ellis Bouzy ("Bouzy") is a New Jersey citizen and
11 CEO of Bot Sentinel, Inc. Bot Sentinel claims to be an artificial intelligence
12 technology company that identifies and eliminates disinformation on the
13 internet and is closely integrated with Twitter. Bouzy became a culpable
14 person when he agreed to cooperate with members of the Enterprise for the
15 common purpose of damaging Goodman and his business property.

16 Plaintiff alleges as follows with regard to Bouzy;

- 17 a. Bouzy participated in a scheme in violation of 18 U.S. Code § 4 to
18 deliberately obscure facts related to the death of Peter W. Smith
19 ("Smith").
20 b. Bouzy participated in a scheme in violation of 18 U.S. Code § 1513
21 when he threatened Goodman to publicly promote false rape
22 allegations in an attempt to prevent Goodman from reporting
23 information Bouzy disfavored.

- 1 c. Bouzy made false statements and fraudulent misrepresentations over
2 the internet in violation of 18 U.S. Code § 1343 with the malicious
3 intention to deprive Goodman of property and deliberately destroy
4 his social media accounts and causing substantial financial damage
5 to Goodman beginning n 2020.
- 6 d. Bouzy participated in a scheme to obstruct justice in this Court with
7 frivolous filings and other acts intended to harass litigants and delay
8 proceedings in violation of 18 U.S. Code § 1503.
- 9 e. Bouzy participated in a scheme to harass and defame Goodman by
10 alleging false, unfounded claims of heinous criminal activity with
11 the deliberate intent of inciting public hatred against Goodman.

12 5) Defendant - Bot Sentinel, Inc ("Bot Sentinel") is a U.S. Corporation registered
13 in New Jersey that claims to be an online artificial intelligence tool for
14 detecting and reporting inauthentic activity and disinformation on Twitter.
15 Bot Sentinel became a culpable person when Bouzy used it to assist the
16 Enterprise in furtherance of the common plan and for the common purpose of
17 damaging Goodman and his business property.

18 Plaintiff alleges as follows with regard to Bot Sentinel;

- 19 a. Bot Sentinel is a tool for identifying, attacking, and destroying
20 “enemy” social media accounts and a corporate conduit for Bouzy to
21 receive anonymous online payments for alleged unlawful activity.
- 22 b. Bot Sentinel participated in a scheme in violation of 18 U.S. Code
23 §1513, 18 U.S. Code 875(d) and New York Consolidated Laws,

1 Penal Law - PEN § 135.60 when it was used to maliciously destroy
2 social media accounts owned by Goodman based on the false claim
3 that the accounts had published false information purportedly with
4 the intent to harm the public.
5

6) Defendant - Benjamin Wittes ("Wittes") is a Washington D.C. citizen,
7 journalist, and Senior Fellow at the Brookings Institution. Wittes is the editor
8 in chief of the Lawfare blog and podcast. Wittes became a culpable person
9 when he agreed to cooperate with the Enterprise and incited Bouzy to cyber
10 stalk and cyber harass Goodman with the common purpose and shared goal of
11 the Enterprise, to damage Goodman and his business property.
12

13 Plaintiff alleges as follows with respect to Wittes;

- 14 a. Wittes participated in a scheme in violation of 18 U.S. Code § 4 to
15 deliberately obscure facts related to the death of Smith.
- 16 b. Wittes participated in a scheme in violation of 18 U.S. Code §
17 875(d) and New York Consolidated Laws, Penal Law - PEN §
18 135.60 when he instructed Bouzy to prevent Goodman from
19 broadcasting information Wittes disfavored.
- 20 c. Wittes participated in a scheme in violation of 18 U.S. Code § 1503
21 when he provided money to Bouzy via payments to Bot Sentinel so
22 that Bouzy could retain Ballard Spahr.
- 23 d. Wittes participated in a scheme in violation of 18 U.S. Code § 1503
24 when he agreed to cooperate with Sweigert and Jankowicz to cause

1 false statements to be made to the Arlington General District Civil
2 Court.

3 7) Defendant – Nina Jankowicz (“Jankowicz”) is the sole proprietor of Sophias
4 Strategies, LLC the former Executive Director of the U.S. Department of
5 Homeland Security Disinformation Governance Board and a Virginia citizen.
6 Jankowicz became a culpable person when she agreed to participate in a
7 scheme with Sweigert in furtherance of the common purpose and with the
8 common goal of damaging Goodman and his business property.
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10

11 Plaintiff alleges as follows with respect to Jankowicz;

- 12 a. Jankowicz participated in a scheme in violation of 18 U.S. Code §
13 1343 when she transmitted a fraudulent claim over the internet to
14 Twitter in violation of 22 U.S. Code § 612.
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16 b. Jankowicz participated in a scheme in violation of 18 U.S. Code §
17 875(d) and New York Consolidated Laws, Penal Law - PEN §
18 135.60 when she made a fraudulent claim to Twitter in an effort to
19 compel Goodman to remove information she disfavored.
20
21 c. Plaintiff alleges Jankowicz violated 22 U.S.C. § 612 by failing to
22 register as an agent of a foreign principal while she was employed as
23 the Executive Director of a U.S. Dept of Homeland Security working
24 group, the Disinformation Governance Board.
25
26 d. Jankowicz participated in a scheme in violation of 18 U.S. Code §
27 1503 when he agreed to cooperate with Sweigert and Wlettes to cause
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false statements to be made to the Arlington General District Civil Court.

8) Defendant – Adam Sharp (“Sharp”) is the Founder and CEO of Sharp Things, LLC, the President and CEO of the National Academy of Television Arts and Sciences and the former Government Liaison for Twitter, Inc. Sharp became a culpable person when he agreed to participate in a scheme with Sweigert in furtherance of the shared purpose and common goal to damage Goodman and his business property.

- a. Sharp coordinated a scheme with Sweigert, either directly or through intermediaries, to sue MSD for an internet post made by Goodman in violation of 47 U.S. Code § 230.

b. Sharp, by his counsel participated in a scheme to make false statements to the Court in violation of 18 U.S. Code § 1343 when he falsely declared his private for-profit company Sharp Things, LLC was inactive during 2020, 2021 and 2022.

- c. Sharp participated in a scheme in violation of 18 U.S. Code § section 1344 and New York Not for Profit Corp L § 717 (2012) to use tax exempt funds to sue a corporation owned by Goodman in violation of the authorized organizational purpose and the by-laws by which NATAS is granted tax exempt status by the Internal Revenue Service (“IRS”)

9) Defendant – Margaret Esquenet (“Esquenet”) is an attorney with is an attorney with Finnegan, Henderson, Farabow, Garrett & Dunner, LLP

1 ("Finnegan") who represented Defendants in prior action against Goodman's
2 dormant corporation MSD. Esquenet became a culpable person when she
3 agreed to participate in a scheme with Sweigert in furtherance of the shared
4 purpose and common goal to damage Goodman and his business property.
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- 6 a. Esquenet coordinated a scheme with Sweigert, either directly or
7 through intermediaries, to sue MSD for an internet post made by
8 Goodman in violation of 47 U.S. Code § 230.
- 9 b. Esquenet participated in a scheme with Sharp to make false
10 statements to the Court in violation of 18 U.S. Code § 1343 when
11 she falsely declared Sharp's private for-profit company Sharp
12 Things, LLC was inactive during 2020, 2021 and 2022.
- 13 c. Esquenet participated in a scheme in violation of 18 U.S. Code §
14 section 1344 and New York Not for Profit Corp L § 717 (2012) to
15 use tax exempt funds to sue a corporation owned by Goodman in
16 violation of the authorized organizational purpose and the by-laws
17 by which NATAS is granted tax exempt status by the Internal
18 Revenue Service ("IRS").
- 19 d. Esquenet participated in a scheme with Sweigert to ghost write a
20 "Statement of Issues" pleading on Sweigert's behalf without
21 informing the Court (ECF No. 122)

- 22 10) Defendant – The Academy of Television Arts and Sciences ("ATAS" or
23 "Television Academy") is one of the key plaintiffs in a vexatious suit
24 wrongfully brought against Goodman's dormant corporation MSD for an

1 improper purpose. ATAS became a culpable person when it agreed to
2 participate in a scheme with Sweigert in furtherance of the shared purpose and
3 common goal to damage Goodman and his business property.
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5 11) Defendant - Seth Berlin ("Berlin") is an attorney with Ballard Spahr and
6 counsel for Bouzy and Bot Sentinel in this case. Berlin became a culpable
7 person when he agreed to participate in a scheme in furtherance of the
8 common goal and for the common purpose to harass Goodman prior to filing
9 a notice of appearance representing defendants.

10 12) Defendant - Maxwell Mishkin ("Miskin") is an attorney with Ballard Spahr
11 and counsel for Bouzy and Bot Sentinel in this case. Mishkin became a
12 culpable person when he agreed to participate in a scheme in furtherance of
13 the common goal and for the common purpose to harass Goodman prior to
14 filing a notice of appearance representing defendants.

15 3. **List the alleged wrongdoers, other than the defendants, and state the misconduct
16 of each wrongdoer.**

17 1) Non-party Steven Biss ("Biss") is a Virginia Attorney who represents the
18 estate of the late Robert David Steele ("RDS") in litigation against Goodman.
19 Through intermediaries, Biss coordinated with Sweigert to foment frivolous
20 litigation against Goodman beginning in 2017 and then to disrupt Goodman
21 with extrajudicial harassment and the intent of gaining an advantage in
22 litigation in violation of 18 U.S. Code § 1503. Biss participated in a scheme
23 beginning in 2022 intended

- 1 2) Non-party Manuel Chavez III (“Chavez”) was one of the intermediaries who
2 communicated with Biss and Sweigert via e-mail telephone and other means.
3 In or around 2018, Chavez claims to have broken contact with Defendants.
4 Chavez provided emails that were presented as evidence in Steele v Goodman
5 and were helpful in dismissing the frivolous case.
- 6 7) Non-party Margaret Esquenet (“Esquenet”) is an attorney with Finnegan,
7 Henderson, Farabow, Garrett & Dunner, LLP (“Finnegan”) and represented
8 NATAS in legal action against a corporation owned by Goodman, Multimedia
9 System Design, Inc (“MSD”). Esquenet coordinated a scheme with Sweigert,
10 either directly or through intermediaries, to sue MSD for an internet post
11 made by Goodman in violation of 47 U.S. Code § 230.
- 12 14) Non-party Roy Warren Marshall aka Steve Quest (“Quest”) is a notorious
13 internet personality (alternately known as “Montagraph”). Quest is infamous
14 for antagonizing and harassing people online and fixating on toxic vendettas
15 that calculates to include real world consequences. Marshall posted videos on
16 YouTube in the days prior to the June 14, 2017 Port of Charleston closure that
17 are likely to prove he and other individuals had prior knowledge of a planned
18 event.
- 19 22) Non-party Scott Anthony (“Anthony”) is a New Jersey Information
20 Technology consultant and an associate of Marshall. Anthony posted
21 comments on his web page and in response to videos posted by Marshall on
22 YouTube in the days prior to the June 14, 2017 Port of Charleston closure that
- 23

1 are likely to prove Anthony and other individuals had prior knowledge of a
2 planned event.

- 3 6) Non-party Richard Loury (“Loury”) is a clerk at the U.S. District Court in the
4 Eastern District of Michigan (“MIED”). Loury participated in a scheme to
5 cause a fraudulent document to be filed via the Pro Se Filing web site hosted
6 by MIED in violation of 18 U.S. Code § 1343.
7
8 7) Non-party Jonathan Snyder (“Snyder”) is an attorney who represented MSD
9 in litigation against NATAS. Snyder withdrew prior to trial citing stalking
10 and cyber harassment by Sweigert. (*See Case 1:20-cv-07269-VEC-OTW*
11 Document 101)
12
13 8) Non-party Seth Berlin (“Berlin”) is an attorney with Ballard Spahr. Berlin
14 participated in a scheme in violation of 18 U.S. Code § 1503 when he sent
15 harassing extrajudicial letters to Goodman in an effort to obstruct litigation
16 brought by Goodman against Bouzy and Bot Sentinel.
17
18 9) Non-party Maxwell Mishkin (“Mishkin”) is an attorney with Ballard Spahr.
19 Mishkin participated in a scheme in violation of 18 U.S. Code § 1503 when he
20 sent harassing extrajudicial letters to Goodman in an effort to obstruct
21 litigation brought by Goodman against Bouzy and Bot Sentinel.

22 **4. List the alleged victims and state how each victim was allegedly injured.**

- 23
24 1) Plaintiff – Jason Goodman was and continues to be injured in his business and
25 suffered a loss of property because of a Defendants’ acts in violation of
26 multiple predicate acts as defined in 18 U.S.C. § 1961. Moreover, Plaintiff
27 was injured by the collective activity of the Enterprise. No single complaint
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1 to a social media company is normally sufficient to destroy a user's account.
2 Defendants, through the Enterprise, endeavor to simulate a large public outcry
3 by using a large group of complaint to affect the victim. Without the
4 collective effort of the Enterprise, Defendants would not have succeeded in
5 damaging Goodman and his business property. Defendants formed and
6 participated in an association in fact enterprise through which they cooperated
7 with one another in furtherance of a common purpose and for the common
8 goal of damaging Goodman and depriving him of property and income.
9 Defendants through this Enterprise, engaged in a pattern of racketeering
10 activity that harmed Goodman financially, destroyed his property and
11 damaged his public reputation. In furtherance of their collective purpose,
12 the Defendants acted as an association in fact enterprise formed by the
13 collective cooperation and work towards a common goal of removing
14 Goodman from the internet and stopping him from reporting facts that are
15 likely to prove Defendants have engaged in criminal action. Defendants
16 received income derived, directly or indirectly, from this pattern of
17 racketeering activity and used that income in furtherance of their common
18 purpose to obtain control over the Enterprise and in continuation of the
19 operation of the Enterprise. The Enterprise engaged in activities that have
20 affected interstate commerce by interfering with Goodman's business
21 transactions with out of state service providers including YouTube, Twitter,
22 Patreon, SubscribeStar, Odysee, and numerous individuals.
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1 **5. Describe in detail the pattern of racketeering activity or collection of unlawful**
2 **debts alleged for each RICO claim**

3 **a. List the alleged Predicate acts**

- 4
- 5 1. On June 14, 2017 video conference via Skype, with Goodman,
6 Defendant Webb, in violation of 18 U.S.C. § 35 and 18 U.S.C.
7 § 1343 fraudulently represented that he had evidence there was
8 dangerous, illicit bomb material on board the cargo ship
9 Maersk Memphis that represented an imminent deadly threat to
10 the Port of Charleston, SC. Webb attempted to convince
11 Goodman to report the threat to authorities rather than report it
12 himself. Webb was in Ohio and or West Virginia during the
13 hours long call, Goodman was in New York.
- 14
- 15 2. Webb and his brother Sweigert concocted a scheme in
16 violation of 18 U.S.C. § 1343 to fraudulently represent that
17 Goodman planned the events of June 14, 2017, involving the
18 Maersk Memphis cargo vessel and the closure of the Port of
19 Charleston, SC.
- 20
- 21 3. In violation of 18 U.S.C. § 1343, Sweigert contacted Senator
22 Hugh Leatherman by email and or U.S.P.S and via the website
23 Change.org (<https://www.change.org/p/s-c-senator-hugh-leatherman-indict-the-charleston-iii-for-closing-the-port-of-charleston-with-a-dirty-bomb-hoax>). Sweigert made false
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1 an investigation into Goodman's alleged activities related to the
2 June 14, 2017 incident.

- 3
- 4 4. In violation of 18 U.S.C. § 1343, Sweigert authored, sold and
5 continues to sell a book titled "The Port of Charleston Dirty
6 Bomb Hoax and Social Media Liability"
7 (https://www.amazon.com/Report-Charleston-Dirty-Social-Liability/dp/1717056792/ref=sr_1_2?crid=23SL0KQSZ92OU&keywords=sweigert+port+of+charleston&qid=1673354352&sprefix=sweigert+port+of+charleston%2Caps%2C107&sr=8-2). The book presents fraudulent claims that Goodman
8 maliciously planned a hybrid cognitive cyberattack on the Port
9 of Charleston, SC on June 14, 2017, for the specific purpose of
10 disrupting critical infrastructure, inciting panic, and creating
11 public alarm, for the purpose of generating YouTube
12 advertising revenue based on evidence that Goodman allegedly
13 knew to be false. Since its publication in 2018, up to and
14 including today, Sweigert derives revenue from the false
15 claims and fraudulent misrepresentations made in the book in
16 violation of 18 U.S. Code § 1343 and U.S. Code § 1513.
17

- 18
- 19 5. Non-party co-conspirator Marshall published a video on
20 YouTube in June of 2022 in which he threatened Goodman
21 with the destruction of his vendor account on Patreon.com if
22 Goodman contacted law enforcement or otherwise reported
23

1 evidence that is likely to prove Marshall knew of a
2 preconceived plan to stage a bomb hoax in the port of
3 Charleston in June 2017 and falsely attribute the hoax to
4 Goodman. Marshal made threats over the internet and
5 published the threats on YouTube in violation of 18 U.S.C. §
6 1343 and 18 U.S.C. § 1513.

- 7
- 8 6. In or around June 2022, in retaliation for reporting facts about
9 the activities of Marshall and Defendants, Marshall contacted
10 Skype or Microsoft or some other agency in violation of 18
11 U.S.C. § 1343 and made false representations that resulted in
12 the termination of Goodman's regular access to his Skype voice
13 over IP account causing the permanent, irreversible loss of
14 multiple business telephone numbers associated with the Skype
15 account.
- 16
- 17 7. Webb, Sweigert and Loury participated in a scheme to cause a
18 fraudulent document to be filed via the Pro Se Filing web site
19 hosted by the U.S. District Court in the Eastern District of
20 Michigan ("MIED") in violation of 18 U.S. Code § 1343 and
21 Michigan Penal Code 750.249. On June 21, 2021, a document
22 was fraudulently back dated and filed by the clerk Loury
23 against Court rules, outside the normal Pro Se electronic filing
24 procedure and in violation of 18 U.S.C. § 1343 and 18 U.S.C. §
25 1503. Defendants interfered with normal court procedures
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with the specific intent of obstructing the Court's ability to administer justice and to deny Goodman the right to a fair trial.

8. Sharp and Sweigert participated in a scheme to fraudulently represent that an anonymous email alerted NATAS of an alleged copyright infringement. The email was sent or caused to be sent by Sweigert in violation of 18 U.S. Code § 1343 and 18 U.S. Code § 1503.

9. Sharp and Sweigert participated in a scheme to harass and intimidate Snyder and compel his withdrawal as counsel for MSD in an effort to gain an advantage in litigation and in violation of 18 U.S. Code § 1503.

10. Sweigert participated in a scheme to file hundreds of vexatious
pleadings in multiple divisions of U.S. District Court and to
unjustly interfere with numerous cases of civil litigation
involving Goodman with the express intent of gaining an
advantage against Goodman and in violation of 18 U.S. Code §
1503.

11. Sweigert participated in a scheme with Witter and Jankowicz to interfere with civil litigation brought by Goodman against Defendants and in violation of 18 U.S.C. § 1503.

12. Wittes participated in a scheme in violation of 18 U.S. Code § 4 to deliberately obscure facts related to the death of Peter W. Smith ("Smith").

1 13. Wittes participated in a scheme in violation of 18 U.S. Code §
2 1513 when he instructed Bouzy to harass and threaten
3 Goodman in an attempt to prevent Goodman from reporting
4 information related to the death of Peter W. Smith.

5 14. Wittes participated in a scheme to hire Ballard Spahr to
6 represent Bouzy and Bot Sentinel in violation of 18 U.S. Code
7 § 1503.

8 15. Bouzy, Sweigert and Jankowicz participated in a scheme in
9 violation of 18 U.S. Code § 1343 to maliciously make false
10 representations to third parties including Twitter.com,
11 YouTube.com, Facebook.com, Patreon.com,
12 SubscribeStar.com and Odysee.com with the specific wrongful
13 intent of destroying Goodman's intellectual property and
14 terminating his access to internet accounts his business relied
15 on, proximately causing significant financial damage to
16 Goodman beginning in 2020.

17 16. Sweigert and Sharp participated in a scheme to make
18 fraudulent representations to the Court alleging that MSD, a
19 corporation owned by Goodman, engaged in copyright
20 infringement for actions taken by Goodman in his personal
21 capacity in violation of 47 U.S. Code § 230 and 18 U.S. Code §
22 1503. Defendants acted with the deliberate intent of financially
23 damaging Goodman and bankrupting his corporation with

vexatious litigation proximately causing significant financial damage beginning in 2020.

17. Bouzy and Bot Sentinel participated in a scheme to destroy
social media accounts and financially harm Goodman's
business based on malicious false statements and in violation
of 18 U.S. Code § 1343 and 18 U.S. Code § 1503.

18. These acts together form a pattern of racketeering because they
are all related to one another and share the common purpose of
harassing Goodman, destroying his business and extorting
money from him through vexatious litigation. Defendants
derived income from these illegal acts and operated as an
association in fact enterprise with a common purpose and for a
common goal, to destroy Goodman's ability to report true facts
and to earn income as an investigative journalist and
documentarian.

19. These acts and their perpetrators are related to each other and
are part of a common plan to classify Goodman's statements as
"disinformation" and to halt Goodman's ability to communicate
with the public via the internet or to earn money as an
investigative journalist and documentarian.

20. On January 9, 2023, Sweigert, Jankowicz and Witles
participated in a scheme to obtain an order of protection
enjoining Goodman from communicating with or about

1 Jankowicz on the basis of false statements made to the
2 Arlington General District Court in violation of 18 U.S. Code
3 §§ 1503 and 1513.
4

5 **b. Provide the dates of, the participants in, and a description of the
6 facts surrounding the predicate acts;**

- 7 1. June 14, 2017, Webb provided Goodman with false
8 information about the Maersk Memphis cargo ship that led to
9 an incident resulting in the closure of the Port of Charleston,
10 SC.
11
12 2. June 14, 2018 Sweigert published a book containing false
13 claims and fabricated evidence in support of the scheme
14 intended to frame Goodman for the closure of the Port of
15 Charleston, SC
16
17 3. Throughout 2018, 2019, 2020, 2021 and 2022 Webb, Sweigert,
18 Biss, Chavez, Quest and others were in communication over
19 telephone and the internet in furtherance of a scheme to bring
20 multiple civil lawsuits against Goodman in an effort to obstruct
21 his rights, destroy his property, extort money from him and
22 interfere with the due administration of justice in the U.S.
23 District Courts.
24
25 4. September 4, 2020, Sharp brought legal action against MSD, a
26 corporation owned by Goodman, for intellectual property and
27 internet posts created by Goodman in his personal capacity and
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1 unrelated to MSD for the wrongful purpose of preventing
2 Goodman from engaging in protected first amendment activity
3 and to extort money from Goodman by bankrupting his
4 corporation with vexatious litigation.

5. December 2020, Bouzy and Bot Sentinel made false and
6 materially misleading claims that defamed Goodman with the
7 specific intent of subjecting Goodman to public hatred and
8 scorn.
- 9
10. December 2020, Bouzy and Bot Sentinel made false claims to
11 Twitter, Facebook, YouTube and others with the express intent
12 of damaging Goodman's business and destroying his social
13 media accounts and his public reputation.
- 14
15. June 2022, Quest threatened, harassed, and cyber stalked
16 Goodman with video posts and other statements published to
17 third parties.
- 18
19. June 2022, Quest destroyed Goodman's irreplaceable property
20 when he made a false representation to Skype.com and or
21 Microsoft or some other agency in retaliation for Goodman
22 contacting the Columbia, SC FBI Field office and speaking
23 with Chief Division Counsel Donald A. Wood to present
24 evidence that is likely to prove Quest had prior knowledge of
25 events that took place related to the Maersk Memphis and the
26 closure of the Port of Charleston in June of 2017.
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1 9. Sweigert, Bouzy, Bot Sentinel, Wites, Berlin and Mishkin
2 participated in a scheme to obstruct justice when they
3 improperly interfered in, and otherwise disrupted and delayed
4 litigation brought by Goodman against Bouzy, Bot Sentinel.
5

6 c. **Identify the time, place and contents of the alleged**
7 **misrepresentations, and the identity of persons to whom and by**
8 **whom the alleged misrepresentations were made**

9 1. April 14, 2018 Sweigert published a book replete with false
10 claims alleging Goodman planned a bomb hoax. (June 14,
11 2017, Webb provided Goodman with false information about
12 the Maersk Memphis cargo ship that led to an incident
13 resulting in the closure of the Port of Charleston, SC. Sweigert
14 claims to have sent the contents of this publication to
15 lawmakers including South Carolina Senator Hugh
16 Leatherman.

17 2. Throughout 2018, 2019, 2020, 2021 and 2022 Webb, Sweigert,
18 Biss, Chavez, Quest and others were in communication over
19 telephone and the internet in furtherance of a scheme to bring
20 multiple civil lawsuits against Goodman in an effort to obstruct
21 his rights, destroy his property, extort money from him and
22 interfere with the due administration of justice in the U.S.
23 District Courts.

- 1 3. September 4, 2020, Sharp brought legal action against MSD, a
2 corporation owned by Goodman, in violation of 47 U.S. Code
3 –β and for the wrongful purpose of preventing Goodman from
4 engaging in protected first amendment activity and to extort
5 money from Goodman by bankrupting his corporation.
- 6
7 4. December 2020, Bouzy and Bot Sentinel made false and
8 materially misleading claims to Twitter, Facebook, YouTube
9 and others with the express intent of damaging Goodman's
10 business and destroying his access to social media and his
11 public reputation.
- 12
13 5. June 2022, Quest threatened, harassed, and intimidated
14 Goodman. Quest destroyed Goodman's irreplicable property
15 when he made a false representation to Skype.com and or
16 Microsoft or some other agency in retaliation for Goodman
17 contacting the Columbia, SC FBI Field office and speaking
18 with Chief Division Counsel Donald A. Wood to present
19 evidence that is likely to prove Quest had prior knowledge of
20 events that took place related to the Maersk Memphis and the
21 closure of the Port of Charleston in June of 2017.
- 22
23 6. Sweigert, Bouzy, Bot Sentinel, Wites, Jankowicz, Berlin and
24 Mishkin participated in a scheme to obstruct justice when they
25 improperly interfered in, and otherwise disrupted and delayed
26 litigation brought by Goodman against Bouzy, Bot Sentinel.).

1 7. On January 9, 2023, Jankowicz made a false statement to the
2 Arlington General District Court in violation of 18 U.S. Code
3 §§ 1503 and 1513 claiming she had been threatened with
4 violence by Goodman in order to fraudulently obtain an order
5 of protection against Goodman and in furtherance of the
6 common scheme to damage Goodman.

7

8 d. **State whether a predicate act is based upon a criminal
9 conviction.**

10

11 1. To the best of Plaintiff's knowledge, none of these alleged
12 crimes have resulted in charges or conviction of any of the
13 alleged perpetrators

14

15 e. **State whether civil litigation has resulted in a judgment with
16 regard to the predicate acts;**

17

18 1. No judgement has resulted from any civil litigation of these
19 allegations as predicate acts under RICO as of yet.

20

21 f. **Describe how the predicate acts form a "pattern of racketeering
22 activity"**

23

24 1. The predicate acts form a pattern of racketeering activity
25 because they were calculated and coordinated to achieve the
26 common goal of denying Goodman's first amendment and
27 second amendment rights, destroying Goodman's ability to
28 conduct legitimate investigative news reporting on matters of
 public interest, destroying Goodman's business and public

reputation, eliminating Goodman's ability to access major social media platforms including Twitter, YouTube, Facebook and others, denying Goodman's ability to earn money, denying Goodman's right to freely access the courts, and denying Goodman's right to a fair trial.,

g. State whether the alleged predicate acts relate to each other as part of a common plan. If so, describe in detail

1. The alleged predicate acts are related to each other as part of a common plan because they were calculated to harm Goodman financially and coordinated by Sweigert and his co-conspirators with the common goal of terminating Goodman's ability to do business and earn a living as an investigative journalist.. The coconspirators coordinated through clandestine communications on Twitter, YouTube and other means including email, direct messaging, and steganographic encoding methods.

6. Describe in detail the alleged enterprise for each RICO claim. A description of the enterprise shall include the following information:

a. State the names of the individuals, partnerships, corporations, associations, or other legal entities that allegedly constitute the enterprise;

1. The alleged enterprise is managed and coordinated by Sweigert. His brother Webb was the initial point of contact

1 with Goodman and Webb has continued to conspire with
2 Sweigert to wrongfully sue Goodman in various Districts
3 around the U.S. Goodman alleges Sweigert opportunistically
4 contacted Sharp after Goodman created a parody of the
5 EMMYs statuette providing an irresistible opportunity for
6 Sharp's non-profit corporation NATAS to sue. Sweigert,
7 Sharp, Esquenet and her partners at Finnegan, Henderson,
8 Farabow and Dunnar, LLP calculated a plan to sue a
9 corporation owned by Goodman, thereby compelling him to
10 spend dozens of thousands of dollars retaining counsel rather
11 than rightfully being allowed to defend himself pro se against
12 their claims. Prior to litigation, Esquenet was directly alerted
13 by Goodman of the high probability that a vexatious outside
14 party (Sweigert) was attempting to draw her client into
15 litigation. Esquenet ignored this well-founded warning and
16 proceeded to sue at great expense to her non-profit client
17 NATAS and went on to continue to communicate with and
18 accept helpful information from Sweigert that was used
19 throughout the course of litigation against Goodman's
20 corporation. Jankowicz became involved in the enterprise
21 while she was the executive director of the U.S. Dept of
22 Homeland Security Disinformation Governance Board and
23 after Goodman released a report revealing her failure to
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28

1 register pursuant to 22 U.S. Code § 612. Jankowicz and or
2 Sweigert contacted Patreon.com and made false claims in an
3 effort to terminate Goodman's business relationship with
4 Patreon.com and stop Goodman from earning a living as an
5 investigative journalist. On January 9, 2023 in violation of 18
6 U.S. Code §§ 1503 and 1513, Jankowicz coordinated with
7 Wittes and Sweigert to obtain an order of protection against
8 Goodman by making a false statement to the Arlington General
9 District Court.

10

11 b. **Describe the structure, purpose, function and course of conduct**
12 **of the enterprise;**

13

14 1. The Enterprise is designed to mimic the structure of
15 anonymized, decentralized computer applications similar to
16 peer-to-peer networks like the now defunct Napster. *See A&M*
17 *Records, Inc. v. Napster, Inc.*, 239 F.3d 1004 (9th. Cir., 2001)
18 Napster allowed anonymous users around the world to illegally
19 distribute copyright protected music and other data without the
20 use of a traditional central server or data center and through
21 encrypted, clandestine peer-to-peer connections. These tactics
22 seek to encrypt and carefully hide connections between
23 members of the Enterprise just as Napster concealed
24 communications between network nodes to avoid detection and
25 "dance between the raindrops" of the law, enabling illegal
26 communications.
27

28

1 activity prior to the groundbreaking ruling against the
2 technology startup. Just as with Napster, the Enterprise utilizes
3 methods that are intended to hide the activities of the
4 collective, obscure direct connections between the participants
5 and to avoid prosecution or civil litigation. The openly stated
6 goal of several members of the Enterprise is to counteract so
7 called “disinformation” and the function of the Enterprise is the
8 same but focused solely on Goodman. Information
9 Governance is the self-appointed duty of Sweigert, Bouzy and
10 in the case of Jankowicz, it is the widely publicized purpose of
11 the Disinformation Governance Board of which she was the
12 Executive Director during the course of her wrongdoing. No
13 such information policing role is granted to the U.S.
14 Government or any subdivision of it in the Constitution or
15 otherwise codified in law. Because of this, any parties engaged
16 in information governance of the kind the Enterprise is, must
17 rely on pseudo-regulation and arbitrary rules otherwise referred
18 to as “terms of service” as described by the private sector
19 corporations that control major social media platforms and
20 internet service providers. The Enterprise seeks to coordinate
21 and even deceive groups of individuals including unsuspecting
22 members of the public to engage in mass complaints in an
23 effort to eliminate unfavorable social media users such as
24
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1 Goodman. By defaming Goodman, public hatred against him
2 was amplified and the Enterprise increased its ability to turn
3 public opinion against Goodman in an effort to undermine his
4 factual reporting on the basis of false statements. The
5 Enterprise utilizes deceptive, pseudonymous accounts to
6 amplify its activity and increase the perception of mass hatred
7 toward Goodman. The enterprise has also engaged in a
8 campaign of coordinating vexatious litigation against Goodman
9 and a corporation owned by Goodman in an effort to
10 overwhelm Goodman financially and logically and prevent
11 him from continuing with his investigative journalism that is
12 likely to implicate members of the Enterprise in criminal
13 activity that is newsworthy and in the public interest. The
14 purpose of the Enterprise is to prevent Goodman from
15 succeeding in his efforts by destroying his business and public
16 reputation and denying him access to social media web sites
17 through which Goodman publishes his investigative reports.

21 c. **State whether any defendants are employees, officers or**
22 **directors of the alleged enterprise;**

- 24 1. The collective in question is an association in fact Enterprise
25 and not an incorporated or other traditional business entity. As
26 such, the existence of any legitimate employees is unknown
27 and unlikely. However, it is equally unlikely that so many

1 individuals could maintain such concentrated and sophisticated
2 activity for as long as they have without ongoing financial
3 support. Participants in the Enterprise earn money through
4 various anonymized methods including YouTube “super chat”,
5 PayPal, GoFundMe, Venmo, bitcoin, steemit or other crypto
6 currencies and other online payments that can be made through
7 pseudonymous or completely anonymous accounts.

8

9 **d. State whether any defendants are associated with the alleged
10 enterprise;**

- 11
- 12 1. Each of the named defendants are directly associated with the
13 alleged Enterprise and have each engaged in predicate acts
14 pursuant to 18 U.S. Code § 1962.

15

16 **e. State whether you are alleging that the defendants are
17 individuals or entities separate from the alleged enterprise, or
18 that the defendants are the enterprise itself, or members of the
19 enterprise; and**

- 20 1. To the best of Goodman’s knowledge, the Defendants are
21 individual members of the Enterprise, and each is an
22 independent legal entity operating collectively with the
23 exception of Bot Sentinel and ATAS. These corporate entities
24 are themselves each a culpable person because they
25 participated in the Enterprise in furtherance of the common
26 goal and for the common purpose to damage Goodman.

1 f. If any defendants are alleged to be the enterprise itself, or
2 members of the enterprise, explain whether such defendants are
3 perpetrators, passive instruments, or victims of the alleged
4 racketeering activity.

- 5 1. Each of the Defendants are members of the Enterprise and
6 perpetrators of the alleged racketeering activity.

7 **7. Describe the alleged relationship between the activities of the enterprise and the**
8 **pattern of racketeering activity. Discuss how the racketeering activity differs**
9 **from the usual and daily activities of the enterprise, if at all**

- 10 1) The Enterprise has no legitimate purpose outside of harassing and intimidating
11 Goodman and eliminating his ability to earn a living as an investigative
12 journalist and documentary filmmaker. There is no usual daily activity of the
13 Enterprise aside from defaming and harassing Goodman and engaging in
14 predicate acts. The Enterprise exclusively engages in a pattern of racketeering
15 activity aimed at destroying Goodman's business and public reputation.

16 **8. State and describe in detail whether you are alleging that the pattern of**
17 **racketeering activity and the enterprise are separate or have merged into one**
18 **entity.**

- 19 1) The sole and exclusive purpose of the Enterprise is to engage in a pattern of
20 racketeering activity aimed at damaging Goodman. There is no separate
21 function of the Enterprise that Goodman is aware of. The evidence that
22 defines the pattern of racketeering activity also describes the Enterprise.

1 **9. Describe what benefits, if any, the alleged enterprise receives from the alleged**
2 **pattern of racketeering.**

3 1) The primary goal of the Enterprise is to eliminate Goodman's ability to report
4 allegations of criminal activity ascribed to members of the Enterprise. This
5 benefits members by avoiding public scrutiny and reducing the likelihood of
6 criminal prosecution while simultaneously furthering their political and
7 financial goals. In the case of Jankowicz, she has publicly disclosed her
8 financial compensation earned during the course of her participation with the
9 Enterprise. Sweigert has benefited financially through the publication of a
10 book which contains false statements intended to implicate Goodman in the
11 planning of a bomb hoax that affected the Port of Charleston, SC. Webb earns
12 money through Venmo and other payment methods in part as a function of his
13 participation in the Enterprise and predicate acts he has committed in the
14 course of harming Goodman. Bouzy earns money through donations to Bot
15 Sentinel which he promotes in conjunction with his malicious efforts aimed at
16 destroying Goodman's property.

17 **10. Describe the effect of the activities of the enterprise on interstate or foreign**
18 **commerce.**

19 1) The Enterprise has disrupted Goodman's ability to conduct business on the
20 internet with viewer customers around the world and with multiple companies
21 around the world including YouTube, Twitter, Patreon, SubscribeStar and
22 Odysee. The Enterprise has continually sought to disrupt Goodman's
23 business relationships with Patreon.com, SubscribeStar.com and Odysee.com,

1 three websites through which Goodman processes credit card payments and
2 provides sponsor viewers with access to premium video content available only
3 to paying subscribers. Since 2020, the activity of the Enterprise has had a
4 direct and ongoing negative affect on Goodman's ability to reach new
5 customers and retain existing customers by reducing Goodman's access to
6 social media sites used to promote his subscription service to customers
7 around the United States and the world.

9 **11. If the complaint alleges a violation of 18 U.S.C. § 1962(a), provide the following
10 information:**

- 12 a. State who received the income derived from the pattern of
13 racketeering activity or through the collection of an unlawful debt;
14 and
15 b. Describe the use or investment of such income.
16 1.

17 12. if the complaint alleges a violation of 18 U.S.C. § 1962(b), describe in detail the
18 acquisition or maintenance of any interest in or control of the alleged enterprise.

- 20 a. Sweigert acquired interest in the Enterprise when created the Cyber
21 Militia which is an amorphous collection of individuals that he
22 maintains and controls through online activity in a similar manner to
23 a social media group on Facebook or Twitter.
25 b. The Cyber Militia interfaces with members of the U.S. Department
26 of Homeland Security's working group of civilian professionals

1 known as the Disinformation Governance Board including
2 Jankowicz and Wittes.

- 3
- 4 c. Defendant Bouzy acquired interested in the Enterprise and became
5 an active participant in the Cyber Militia when he received
6 information from Sweigert via Twitter and used that information in
7 furtherance of the Enterprise's common purpose and for the common
8 goal of damaging Goodman and his business property.
- 9 d. Defendants Sharp and Esquenet acquired interested in the Enterprise
10 and became active participants in the Cyber Militia when they
11 received information from Sweigert and used that information in
12 furtherance of the Enterprise's common purpose and for the common
13 goal of damaging Goodman and his business property.

14 **13. If the complaint alleges a violation of 18 U.S.C. § 1962(c):**

- 15
- 16 a. The Enterprise is not an incorporated entity and has no employees
17 but each of the defendants are associated with the Enterprise. They
18 share communications between one another to cooperate and
19 coordinate in furtherance of their common goal and for the common
20 purpose of damaging Goodman.
- 21
- 22 b. The culpable people are the individual participants in the Enterprise.

23

24 **14. If the complaint alleges a violation of 18 U.S.C. § 1962(d), describe in detail the**
25 **alleged conspiracy.**

26 Defendants conspired with one another and third parties to maliciously and fraudulently
27 file mass complaints against plaintiff in various venues. Defendants coordinated with one
28

1 another to make false statements to YouTube, Facebook, Twitter and various Courts including
2 U.S. District Courts and the Arlington General District Court.

3 15. Describe the alleged injury to business or property.
4

5 While the specific predicate acts, when evaluated on their own, were insufficient to cause injury
6 to business or property individually, the cumulative effort of the Enterprise and all of the actions
7 in combination resulted in the damage to Goodman's public reputation and business property.
8 Goodman's access to YouTube, Twitter and Facebook was wrongfully obstructed as a result of
9 the conspiracy between defendants and the direct actions of the Enterprise.
10

11 16. Describe the direct causal relationship between the alleged injury and the violation of
12 the RICO statute.
13

14 Because small individual actions are frequently insufficient to trigger algorithms or
15 provoke a review of any alleged violation, the defendants utilized the Enterprise in furtherance of
16 their common purpose and for the common goal of suppressing Goodman's first amendment and
17 second amendment rights, to damage his public reputation and to destroy his access to the
18 business property that was his valuable branded social media accounts.
19

20 17. List the damages sustained for which each defendant is allegedly liable.
21

22 Each of the defendants are jointly and severally liable for the damage caused to Goodman's
23 reputation and business because they each participated in the Enterprise for the common goal and
24 with the common purpose of damaging Goodman's public reputation and destroying his ability
25 to conduct business or access his business property.
26

27 18. List all federal causes of action, if any, and provide the relevant statute numbers.
28

Defendants jointly and severally violated

- a. 18 U.S. Code § 1962(b)(c) and (d)

- 1 b. 18 U.S. Code § 1512
- 2 c. 18 U.S. Code § 1503
- 3 d. 18 U.S. Code § 1543
- 4 e. 18 U.S. Code § 1513(b)(1)
- 5 f. 18 U.S. Code § 1513(b)(2)
- 6 g. 22 U.S. Code § 612

7
8 19. List all federal causes of action, if any, and provide the relevant statute numbers.

- 9 a. 18 U.S. Code § 1962(b)(c) and (d)

10 20. List all pendent state claims, if any.

- 11 a. New York Not-For-Profit Corporation Law - NPC § 712-a

- 12 b. New York Judiciary Law - JUD § 487

13
14
15 Signed this 17th day of February 2023

16 Respectfully submitted,



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